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United States  
Department of  
Agriculture

Food and  
Nutrition  
Service

Mountain Plains  
Region

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Denver, CO  
80204-3581

Reply to

Attn. Of: SFSP-387

Subject: Summer Food Service Program (SFSP) Policy  
Memorandum 22-99: Requirement For First-Week Visits  
In The SFSP

To: STATE AGENCY DIRECTORS - Colorado ED, Iowa, Kansas  
(Child Nutrition Programs) Missouri DH, Montana OPI,  
Nebraska ED, North Dakota,  
South Dakota, and Utah

Section 225.15(d)(2) of the SFSP Regulations requires all sponsoring organizations to "visit each of their sites at least once during the first week of operation under the Program and . . . [to] promptly take such actions as are necessary to correct any deficiencies." The purpose of this requirement is to ensure that SFSP sponsors are aware of operational problems at sites at the beginning of the Program, and can take action to correct such problems before they result in the establishment of a fiscal claim against the sponsor.

In a recently-published SFSP rule (63 FR 54617, October 13, 1998), we proposed to differentiate between SFSP sponsors and sites based on their past record in administering the SFSP. The rule proposed to reduce application requirements for sponsors and sites which successfully administered the SFSP in the prior year (i.e., had no significant operational problems in prior-year reviews). It also proposed to modify State Agency (SA) review requirements by placing less emphasis on the number of sponsor and site reviews performed in a given year and greater emphasis on reviewing sponsors which are large, new to SFSP, have new staff responsible for the administration of SFSP, or had significant operational problems in their prior-year reviews. SAs would still be required to review first-time sponsors during their first year of operation, while all experienced and successful sponsors would need to be reviewed at least once every 3 years.

The rule did not propose changes to the first-week visit requirement at Section 225.15(d)(2), since we continue to believe that sponsor visits at the start of Program activities enable sponsors to detect small problems before they become large problems. At the same time, consistent with the proposed rule's intent, we have granted a waiver of the first-week visit requirement to several sponsors having sites with experienced staff and no significant operational problems in their prior year. We wish to extend the possibility of waiving this requirement to other sponsors with identical circumstances.

Specifically, the sponsors receiving the waiver were school food authorities (SFAs) which administer a number of school-based SFSP sites staffed by experienced school-year food service workers. SA reviews had shown that these specific sites operated smoothly from one year to the next, while other types of sites (including some school sites with new or less experienced staffs) had more problems in administering the SFSP. Waiving the first-week visit requirement at well-run, experienced school-based sites sponsored by a SFA and operated by experienced staff from year to year will allow the SFA to devote more time to training and monitoring activities during the first-week visits they conduct at other school and non-school sites with less experienced employees or less successful programs. We have made reference to "experienced" staff in this memorandum, and in the recently published proposed rule mentioned above. When we refer to "experienced" sponsors and staff, we generally mean skillful, capable individuals that operated a well-run SFSP in the prior year(s).

Therefore, this memorandum authorizes SFA sponsors to apply to their SA for waivers of the first-week visit requirement in cases with circumstances identical to those described in the preceding paragraphs. SAs may grant a waiver of the requirement on a site-by-site basis for 1 year, with the possibility of additional renewals. They will be required to report to Regional Offices only the number of such sites and their approximate average daily

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attendance. We believe that granting waivers for the first-week visit will meet the intent of the law's requirement to facilitate SFA participation in SFSP, and the Department's effort to streamline administrative requirements in, and expand access to, the SFSP.

If you have any questions, contact our staff at (303) 844-0359.



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Regional Director  
Child Nutrition Programs